



**Privacy Impact Assessment
(PIA)**

**General Sales Manager Data Mart
(GSMDM)**

Revision: 1.06



Farm Service Agency

Date: *July 31, 2009*



Privacy Impact Assessment for
General Sales Manager Data Mart (GSMDM)



Document Information

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| Document Revision and History | | | |
|-------------------------------|---------------|--------------|---------------------------------------------------------------------------------------------------------------|
| Revision | Date | Author | Comments |
| 1.01 | July 6, 2009 | Scott Tanos | Initial version |
| 1.02 | July 8, 2009 | Scott Tanos | Populated from previous PIA document |
| 1.03 | July 21, 2009 | D.Brizendine | Removed Web PC information |
| 1.04 | July 22, 2009 | C. Caruthers | -Added contact information to system information table - Reviewed and answered all items on questionnaire. |
| 1.05 | July 24, 2009 | D.Brizendine | Updated responses for questions 24,25,26,26.1; Document review; |
| 1.06 | July 31, 2009 | D.Brizendine | Updated responses for 2.1, 18.1, template updates |
| | | | |



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1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the **General Sales Manager Data Mart (GSMDM)** affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



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2 System Information

| System Information | |
|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Agency: | Farm Service Agency (FSA) |
| System Name: | General Sales Manager Data Mart |
| System Type: | <input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application |
| System Categorization (per FIPS 199): | <input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low |
| Description of System: | The General Sales Manager Data Mart (GSMDM) purpose is to streamline the reporting process by implementing a common computing procedure that accommodates the programming team in performing maintenance of the financial data collected by the GSM Web PC application. |
| Who owns this system? (Name, agency, contact information) | Angela J. Sieg AFAO 6501 Beacon Drive U.S. Department of Agriculture Farm Service Agency Kansas City, MO 64133 (816) 926-1923 angela.sieg@kcc.usda.gov |
| Who is the security contact for this system? (Name, agency, contact information) | Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue, SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov |



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| System Information | |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Who completed this document? (Name, agency, contact information) | Chris Caruthers AFAO-AGG 6501 Beacon Drive U.S. Department of Agriculture Farm Service Agency Kansas City, MO 64133 (816) 926-6848 christophor.caruthers@kcc.usda.gov |

3 Data Information

3.1 Data Collection

| No. | Question | Response |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Generally describe the data to be used in the system. | Customer – Evidence of export, NOD, NOA, claims, fees, guarantee bank name, account number Employees – Interest rates, bank and country limits |
| 2 | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3. |
| 2.1 | State the law or regulation that requires the collection of this information. | 7 U.S.C. 135b, 450j, 450k, 405l, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301- 1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469 |
| 3 | Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4 | Sources of the data in the system. | Customer, banks, Treasury Department |



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| No. | Question | Response |
|-----|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.1 | What data is being collected from the customer? | Customer – Evidence of export, NOD, NOA, claims, fees, guarantee bank name, account number Employees – Interest rates, bank and country limits |
| 4.2 | What USDA agencies are providing data for use in the system? | Treasury Department, State Department, FAS, FSA. FAS, and FSA both own portions of the database data. |
| 4.3 | What state and local agencies are providing data for use in the system? | N/A |
| 4.4 | From what other third party sources is data being collected? | Treasury Department |
| 5 | Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6. |
| 5.1 | How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness? | Reconciliation and Review |
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness? | Reconciliation and Review |
| 5.3 | How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness? | Reconciliation and Review |

3.2 Data Use

| No. | Question | Response |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| 6 | Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected? | N/A, the system does not collect information on individuals – only organizations (Foreign Banks, U.S Exports and U.S Importers). |
| 7 | Will the data be used for any other purpose? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8. |
| 7.1 | What are the other purposes? | |



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| No. | Question | Response |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| 8 | Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 9 | Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10. |
| 9.1 | Will the new data be placed in the individual's record (customer or employee)? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 9.2 | Can the system make determinations about customers or employees that would not be possible without the new data? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 9.3 | How will the new data be verified for relevance and accuracy? | N/A |
| 10 | Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected? | N/A, the system does not collect information on individuals – only organizations (Foreign Banks, U.S Exports and U.S Importers). |
| 11 | Will the data be used for any other uses (routine or otherwise)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12. |
| 11.1 | What are the other uses? | N/A |
| 12 | Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13. |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access? | E-Authentication and application level passwords. |



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| No. | Question | Response |
|------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| 13 | Are processes being consolidated? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14. |
| 13.1 | What controls are in place to protect the data and prevent unauthorized access? | N/A |

3.3 Data Retention

| No. | Question | Response |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14 | Is the data periodically purged from the system? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15. There currently is no expiration to the data being stored as documented in the Disaster Recovery Plan. |
| 14.1 | How long is the data retained whether it is on paper, electronic, in the system or in a backup? | |
| 14.2 | What are the procedures for purging the data at the end of the retention period? | |
| 14.3 | Where are these procedures documented? | |
| 15 | While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations? | The schema is saved with the data. The data is saved/updated on a nightly basis. |
| 16 | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

3.4 Data Sharing

| No. | Question | Response |
|-----|---------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| 17 | Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18. |



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| No. | Question | Response |
|------|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 17.1 | How will the data be used by the other agency? | Data is reported to Treasury Department, State Department, USAID, Congress, and Paris Club; however, it is shared via reports passed from the system owners rather than the other agencies having access to the system. |
| 17.2 | Who is responsible for assuring the other agency properly uses the data? | FMD/FAS management |
| 18 | Is the data transmitted to another agency or an independent site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 19. |
| 18.1 | Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected? | ITS SLA – 4/21/2008 |
| 19 | Is the system operated in more than one site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20. |
| 19.1 | How will consistent use of the system and data be maintained in all sites? | Web access via Eauth |

3.5 Data Access

| No. | Question | Response |
|------|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 20 | Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)? | E-Authentication |
| 21 | How will user access to the data be determined? | Determined by need to know. Security requests are approved by management verified by WDC security and KC's GSM Data Warehouse lead, and granted by security officials. |
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 22 | How will user access to the data be restricted? | Users will have restricted access to system data based on business needs, and restricted by discretionary access control methods. |



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| No. | Question | Response |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 23 | Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

3.6 Customer Protection

| No. | Question | Response |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| 24 | Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)? | USDA Privacy Office |
| 25 | How can customers and employees contact the office or person responsible for protecting their privacy rights? | By contacting John Underwood, Privacy Officer, at john.underwood@kcc.usda.gov & 816.926.6992 |
| 26 | A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system? | <input checked="" type="checkbox"/> Yes – If YES, go to question 27. Common FSA incident reporting process. <input type="checkbox"/> No |
| 26.1 | If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date. | |
| 27 | Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28. |
| 27.1 | Explain how this will be mitigated? | N/A |
| 28 | How will the system and its use ensure equitable treatment of customers? | N/A |



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| No. | Question | Response |
|------|-------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 29 | Is there any possibility of treating customers or employees differently based upon their individual or group characteristics? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30 |
| 29.1 | Explain | N/A |

4 System of Record

| No. | Question | Response |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 30 | Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31 |
| 30.1 | How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)? | Data is retrieved in a variety of ways – the data is not put into an individual table to easily access an identifier; however, the combination of the tables/data might give a link to identify data if the person using the data knew how to link the tables and how to relate the identifiers. |
| 30.2 | Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .) | None, the GSM system contains information on businesses, not individuals. |
| 30.3 | If the system is being modified, will the SOR require amendment or revision? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

5 Technology

| No. | Question | Response |
|------|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| 31 | Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, the questionnaire is complete. |
| 31.1 | How does the use of this technology affect customer privacy? | No impact. |



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6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.